

Appln No. 09/839,944

Amdt date April 6, 2004

Reply to Office action of January 6, 2004

REMARKS/ARGUMENTS

Claims 1 and 3-40 will now be pending in this application upon entry of the amendment. Claims 24-31 have been amended, and claims 39 and 40 have been added. The amendments find full support in the original specification, claims, and drawings. No new matter has been added. In view of the above amendments and remarks that follow, reconsideration, reexamination, and an early indication of allowance of claims 1 and 3-40 are respectfully requested.

Claims 24-31 have been amended to correct their dependencies from claim 9 to claim 8. The amendment was made for reasons unrelated to patentability. Entry of the amendment is respectfully requested.

The Examiner rejects claims 1, 3-7, 16-23, and 32-38 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,144,968 to Zellweger in view of U.S. Patent No. 5,544,354 to May et al., and further in view of U.S. Patent No. 6,430,558 to Delano. The Examiner also rejects claims 8-15 and 24-31 under 35 U.S.C. 103(a) as being unpatentable over Zellweger in view of May and Delano as applied to claim 1, and further in view of U.S. Patent No. 6,415,319 to Ambroziak. Applicant respectfully traverses these rejections.

As argued in Applicant's Amendment dated October 6, 2003, Zellweger's structure used to organize keywords is nothing more than a hierarchical tree-type structure that has a top and a bottom. May also discloses a database that is hierarchically arranged. Although the information in either Zellweger or May

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may be ultimately displayed in a circular manner, there is no teaching or suggestion that the structure itself include first and second indexing levels having first and second level content indexes that are "arranged in a substantially circular manner." Because in the cited references the structure itself is not arranged in a substantially circular manner, any display that may be generated in a circular manner has a logical seam demarking the start and beginning of the hierarchy.

The benefit of having all second level content indexes arranged in one substantially circular structure and connected to a first indexing level via first level content indexes that are also arranged in a substantially circular manner is that it allows movement from any first and/or second level content index by finding a short path to a specific content index that a user wants to select.

The Examiner contends that all of the limitations in claim 1 are disclosed by either Zellweger or May, except that "[n]either Zellweger nor May explicitly associate [sic] a weighing value with each of the second level content indexes for the circular arrangement as claimed." The Examiner argues, however, that both Zellweger and May "arrange the content indexes at each level according to a sequence." The Examiner then concludes that "[t]his in itself provides suggestion for arranging each level according to a weighing value representative of a sequence."

Applicant respectfully disagrees. Simply because the keywords in Zellweger or the matrices in May are arranged according to a sequence, it does not provide the specific

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motivation for using the "weighing value" that is recited in independent claims 1, 8, and 32, for making the arrangement.

The Examiner then contends that "Delano discloses a system and method similar to those of Zellweger and May, wherein each hierarchical content indexing level is arranged according to weight values as claimed." Delano discloses a collaborative searching engine 20 that searches a knowledge database for content matching a search query. In this regard, "a relational database table or tables which contain the relationship between the search topics, the content, and the applicability weight of the relationship between the topic and content" is searched for retrieving the appropriate content. (Col. 6, lines 38-42). "Once the appropriate content is selected, the content is sorted or ranked accordingly from the most applicable to the least applicable." (Col. 6, lines 42-44).

The Examiner relies particularly on the portion of Delano that discloses that "[t]he collaborative searching engine 20 presents the top level topics to Browser entities 34 which can follow Links to subtopics or similar topics to access specific Content items." (Col. 7, lines 61-64). According to Delano, "[a]t each level, the subtopics can be presented to the user in a weighted ranking similar to the search mechanism . . ." (Col. 7, lines 64-67). Taking this statement in conjunction with the fact that the browser entities are part of the collaborative searching engine 20 discussed above "for browsing the content of the search results," the weighing of the subtopics in Delano must be based on their relationship to the search query. There is no teaching or suggestion in Delano, however, that the

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weighing is "indicative of an association with the first level content index representing the particular category" as is recited in claims 1, 8, and 32. (See, Col. 5, lines 55-66; Col. 6, lines 38-42). (Emphasis added). Accordingly, independent claims 1, 8, and 32 are now in condition for allowance.

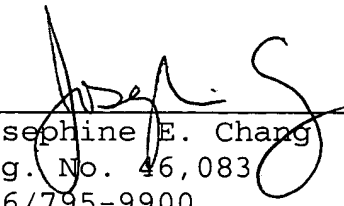
Claims 3-7 and 9-38 are also in a condition for allowance because they depend on an allowable base claim, and for the additional limitations that they contain.

Claims 39 and 40 are new in this application. These claims depend from independent claims 1 and 8, respectively, and are allowable as the independent claims from which each depend, and for the additional limitation recited therein. These claims further specify that "the first level content index is selected from the second level content indexes." This limitation is also neither taught nor suggested by the cited references. Accordingly, claims 39 and 40 are in condition for allowance.

In view of the above amendments and remarks, reconsideration, reexamination, and an early indication of allowance of the now pending claims 1 and 3-40 are respectfully requested.

Respectfully submitted,

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